

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| CITILINE HOLDINGS, INC., Individually | : | Civil Action No. 1:08-cv-03612-RWS |
| and On Behalf of All Others Similarly Situated, | : | |
| | : | <u>CLASS ACTION</u> |
| Plaintiff, | : | |
| | : | |
| vs. | : | |
| | : | |
| ISTAR FINANCIAL INC., et al., | : | |
| | : | |
| Defendants. | : | |
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| DENNIS CHRISTENSON, Individually and | : | Civil Action No. 1:08-cv-03879-RWS |
| On Behalf of All Others Similarly Situated, | : | |
| | : | <u>CLASS ACTION</u> |
| Plaintiff, | : | |
| | : | |
| vs. | : | |
| | : | |
| ISTAR FINANCIAL INC., et al., | : | |
| | : | |
| Defendants. | : | |
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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investor Plumbers' Union Local No. 12 Pension Fund ("Plumbers Local No. 12") and class member Citiline Holdings, Inc. ("Citiline") will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Plumbers Local No. 12 and Citiline as Lead Plaintiffs; (iii) approving Plumbers Local No. 12 and Citiline's selection of the law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Abraham Fruchter & Twersky LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Plumbers Local No. 12 and Citiline submit herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated June 13, 2008.

DATED: June 13, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.

/s/ Mario Alba Jr.
MARIO ALBA JR.

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
RAMZI ABADOU
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ABRAHAM FRUCHTER & TWERSKY LLP
JACK G. FRUCHTER
One Pennsylvania Plaza, Suite 2805
New York, NY 10119
Telephone: 212/279-5050
212/279-3655 (fax)

[Proposed] Co-Lead Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on June 13, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiffs And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Plumbers Local No. 12 And Citiline For Consolidation, Appointment As Lead Plaintiffs And For Approval Of Selection Of Lead Counsel; and

Declaration Of Mario Alba Jr. In Support Of The Motion Of Plumbers Local No. 12 And Citiline For Consolidation, Appointment As Lead Plaintiffs And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to any additional counsel on the attached service list.

/s/ Mario Alba Jr.
Mario Alba Jr.

iSTAR FINANCIAL

Service List - 6/13/2008 (08-0083)

Page 1 of 1

Counsel For Defendant(s)

Matthew D. Parrott
Katten Muchin Rosenman LLP
575 Madison Avenue
New York, NY 10022
212/940-8800
212/940-8776(Fax)

David H. Kistenbroker
Katten, Muchin Rosenman LLP
525 W. Monroe Street, Suite 1600
Chicago, IL 60661-3693
312/902-5200
312/902-1061(Fax)

Counsel For Plaintiff(s)

Jack G. Fruchter
Abraham, Fruchter & Twersky
One Pennsylvania Plaza, Suite 2805
New York, NY 10119
212/279-5050
212/279-3655(Fax)

Evan J. Smith
Brodsky & Smith, LLC
240 Mineola Blvd., 1st Floor
Mineola, NY 11501
516/741-4977
516/741-0626(Fax)

Samuel H. Rudman
David A. Rosenfeld
Mario Alba, Jr.
Coughlin Stoia Geller Rudman & Robbins LLP
58 South Service Road, Suite 200
Melville, NY 11747
631/367-7100
631/367-1173(Fax)

Ramzi Abadou
Coughlin Stoia Geller Rudman & Robbins LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
619/231-1058
619/231-7423(Fax)

Richard A. Maniskas
D. Seamus Kaskela
David M. Promisloff
Schiffrin Barroway Topaz & Kessler, LLP
280 King of Prussia Road
Radnor, PA 19087
610/667-7706
610/667-7056(Fax)

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| | : | <u>CLASS ACTION</u> |
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| Defendants. | : | |
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[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFFS AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the motion of Plumbers' Union Local No. 12 Pension Fund ("Plumbers Local No. 12") and Citiline Holdings, Inc. ("Citiline") for Consolidation, Appointment as Lead Plaintiffs and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. Plumbers Local No. 12 and Citiline are hereby appointed Lead Plaintiffs for the Class pursuant to Section 27 of the Securities Act of 1933; and
3. The law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Abraham Fruchter & Twersky LLP are hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ROBERT W. SWEET
UNITED STATES DISTRICT JUDGE

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